



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

NOV - 5 2014

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-084

**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

EPA WARNING LETTER

Mr. Mike Elliott  
Group Support Manager  
Americold Realty Trust  
10 Glenlake Parkway, Suite 800  
Atlanta, Georgia 30328

Re: Risk Management Program Compliance Inspection  
Americold Woodburn Plant  
1440 Silverton Rd., Woodburn, Oregon 97071  
EPA Facility ID# 1000 0015 9375

Dear Mr. Elliott:

On May 15, 2014, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Americold Woodburn Plant facility, located at 1440 Silverton Rd., Woodburn, Oregon. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Process Hazard Analysis:** Americold failed to update and revalidate their PHA every five years by a team after the completion of the initial PHA to assure that the PHA is consistent with the current process as required by 40 C.F.R. § 68.67(f). The completed 2008 PHA was one year overdue of the required five years from the previous 2002 PHA.
2. **Process Hazard Analysis:** Americold failed to retain their PHAs and updates or revalidations for each process covered, as well as the resolution of recommendations for the life of the process as required by 40 C.F.R. § 68.67(g). Americold was unable to produce the 2002 PHA documentation. The initial PHA on record was completed in 2002, which was three years after the first RMP submission dated August 20, 1999.
3. **Ventilation System Design:** During the inspection, the EPA Inspectors observed an air intake vent located next to an outside recirculation tank and piping on the East wall of the '52 Engine Room. This air intake vent location could pose a potential hazard to operators in the engine during an ammonia release from the recirculation tank and piping. Americold should evaluate and determine how to mitigate this potential hazard.

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at:

[http://www.epa.gov/emergencies/content/rmp/rmp\\_guidance.htm#General](http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General)

We urge you to take the steps necessary to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or [morales.javier@epa.gov](mailto:morales.javier@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Kelly McFadden".

Kelly McFadden  
Manager  
Pesticides and Toxics Unit